

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,  
*et al.*,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-  
GBL-BMK

**PLAINTIFFS' SUPPLEMENTAL EXPERT WITNESS LIST**

Pursuant to the Court's Order of June 21, 2017, and as a replacement for Plaintiffs' original expert, Dr. Stephen Ansolabehere, who is unavailable to serve as an expert witness or testify at the trial set to commence on October 10, 2017, Plaintiffs hereby file this Supplemental Expert Witness List identifying one additional expert who may present a written expert report and may be designated to testify at trial.

- 1. Professor Maxwell Palmer:** Professor Palmer may be designated as a testifying expert witness to testify about the matters addressed in Dr. Stephen Ansolabehere's expert reports and the other expert reports submitted in this case and similar testimony regarding racial predominance and racially polarized voting.

DATED: July 3, 2017

By: /s/ Aria C. Branch

Marc Erik Elias (admitted *pro hac vice*)

Bruce V. Spiva (admitted *pro hac vice*)

Aria Branch (VSB # 83682)

**PERKINS COIE LLP**

700 Thirteenth Street, N.W., Suite 600

Washington, D.C. 20005-3960

Telephone: 202.434.1627

Facsimile: 202.654.9106

Kevin J. Hamilton (admitted *pro hac vice*)

Abha Khanna (admitted *pro hac vice*)

Ryan Spear (admitted *pro hac vice*)

William B. Stafford (admitted *pro hac vice*)

**PERKINS COIE LLP**

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of July, 2017, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch  
Aria C. Branch (VSB #83682)  
Perkins Coie LLP  
700 13th St. N.W., Suite 600  
Washington, D.C. 20005-3960  
Phone: (202) 654-6338  
Fax: (202) 654-9106  
[ABranch@perkinscoie.com](mailto:ABranch@perkinscoie.com)

*Attorneys for Plaintiffs*